

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

KATERI LYNN DAHL,

Plaintiff,

v.

CHIEF KARL TURNER, *et al.*,

Defendants.

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No. 2:22-CV-72

Plaintiff's Motion for Leave to File under Seal an Unredacted Copy of the Complaint

Plaintiff Kateri Lynne Dahl, by counsel Hugh A. Eastwood and Alexis I. Tahinci, moves the Court for Leave to File under Seal an Unredacted Copy of the Complaint (*Ex. 1 – Unredacted Complaint*). In support whereof, Plaintiff states as follows:

1. This is a civil rights case that centers around an individual who was indicted under seal in this Court for being a felon in possession of ammunition, who has an active felony arrest warrant, who knows of the arrest warrant despite his indictment still being under seal, and who has fled and is at large.

2. Plaintiff is a former Special Assistant United States Attorney and a whistleblower at federal and Tennessee law. Plaintiff indicted this individual while she was a SAUSA.

3. In an abundance of caution, and in accordance with Fed. R. Civ. P. 5.2, Plaintiff has identified this individual throughout her pleading as “Robert Voe,” a pseudonym, and redacted the individual’s actual name.

4. Plaintiff moves for leave to file under seal pursuant to L.R. 26.2 an unredacted copy of her Complaint in order to protect the interests of her former client, the United States government, in seizing and prosecuting this individual.

5. Plaintiff is filing this motion contemporaneously with the filing of her redacted Complaint, and therefore does not yet know what Defendants' position is as to filing an unredacted copy of the Complaint.

WHEREFORE Plaintiff, for good cause shown, moves the Court for leave to file under seal an unredacted copy of the Complaint.

Dated: June 24, 2022

Respectfully submitted,

Lead Counsel for Plaintiff Kateri Lynne Dahl

/s/ Hugh A. Eastwood

Hugh A. Eastwood, Missouri Bar No. 62058,
E.D. Mo. Bar No. 62058MO,
*admitted in Missouri, Missouri federal district
courts, the 8th Circuit, and the Supreme Court,
pro hac vice motion pending
pursuant to L.R. 83.5(b)(1)*

Attorney at Law

7911 Forsyth Blvd., Ste. 300
St. Louis, Missouri 63105-3825
hugh@eastwoodlawstl.com
(314) 809 2343
(314) 228 0107 eFax

Co-Counsel for Plaintiff Kateri Lynne Dahl

/s/ Alexis I. Tahinci

Alexis I. Tahinci, TN BPR No. 031808
Tahinci Law Firm PLLC
1227 Volunteer Pkwy, Suite 528
Bristol, TN, 37620
(423) 557-8086
alexis@tahincilaw.com

Certificate of Service

The undersigned certifies that on 6/24/2022 that (s)he filed this document by operation of the Court's CM/ECF system, and emailed a copy to each Defendant.

/s/ Hugh A. Eastwood, 62058MO, pro hac vice motion pending